

REMARKS

This is intended as a full and complete response to the Final Office Action dated September 25, 2007, having a shortened statutory period for response set to expire on December 25, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-4, 7-25 and 28-47 are pending in the application. Claim 42 has been amended. Applicants submit that the amendments do not introduce new matter.

Claim Rejections - 35 U.S.C. § 102

Claims 1-4, 7, 8, 11-16, 19-25, 32-37, and 40-47 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Cox et al.* (US Patent No. 2002/0156806) (hereinafter "Cox"). Applicant respectfully traverses this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

Regarding claims 1, 11, 21, 22, 32, 42, 43, 46, 47:

In this case, Cox does not disclose "each and every element as set forth in the claim". For example, Cox does not disclose "*transformation rules for transforming the abstract data structure into a concrete data structure, the transformation rules describing graphical attributes of the requested graphical representation type*" as recited in claim 1. Claims 11, 21, 22, 32, 42, 43, 46, and 47 recite similar limitations.

In the *Final Office Action*, the Examiner argues that the above limitations are disclosed by Cox page 5, paragraph 44. The Examiner analogizes "the raw data being

analyzed as the abstract data structure, and the implementation of the visualization... as the concrete data structure." Further, the Examiner analogizes "'actions' as the transformation rules." However, the Examiner's analogy fails to explain how this citation discloses "each and every element" of the claim. For example, the Examiner's citation fails to explain how "actions," which are described in Cox as options selected from a list, can represent *subsets of transformation rules*. Further, even if it is assumed, *arguendo*, that selectable actions teach the limitation of subsets of transformation rules, Cox does not teach that each of the "actions" describe *graphical attributes of a requested graphical representation type* and are *specific to a different graphics rendering language*, as well as supporting a *plurality of graphical representation types* and a *plurality of graphics rendering languages*, as recited in claim 1.

Accordingly, for the foregoing reasons, applicant submits that Cox does disclose a method, computer-readable storage medium, or computer that includes all the limitations recited by claims 1, 11, 21, 22, 32, 42, 43, and 47, and therefore, respectfully requests that this rejection be withdrawn.

Regarding claims 2-4, 7-10, 12-18, 23-25, 28-30, and 33-39:

Claims 2-4, 7-10, 12-18, 23-25, 28-30, and 33-39 each ultimately depend from one of claims 1, 11, 22 or 32. As Applicant believes the above remarks demonstrate that the base claims are allowable, Applicant believes that the respective dependent claims are also allowable, and allowance of these claims is respectfully requested.

Regarding claims 19, 20, 32, 40, 41, 44, and 45:

Cox does not disclose the limitation of claim 19 which recites "*transforming the abstract data structure into a plurality of concrete data structures, each concrete data structure corresponding to a different graphics rendering language*". Cox also does not disclose the limitation, as recited in claim 19, of "*abstract data structure templates, each ... associated with a specific graphical representation type*". Claims 20, 32, 40, 41, 44, and 45 recite similar limitations. The Examiner argues that Cox, Figure 8, as well as the corresponding description, discloses the generation of a concrete data structure which

the Examiner analogizes to the concrete data structures described in the present Application. However, as argued above, the cited section of *Cox* does not disclose a transformation process and furthermore, does not disclose a transformation from an abstract data structure into a plurality of concrete data structures. Additionally, the Examiner cites *Cox* at page 7, paragraph 72 as disclosing the selection of an *abstract data structure template*. The cited section discloses a method where the result is an applet which displays a graphical representation. There is no disclosure of a plurality of graphical representations being displayed from one abstract data structure. Further, there is no disclosure of any concrete data structures corresponding to different graphics rendering languages.

Accordingly, for all the foregoing reasons, Applicant submits that *Cox* does disclose all the limitations recited by claims 19, 40, 41, and 45, and therefore, Applicant respectfully requests that this rejection be withdrawn.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 9, 10, 17, 18, 30, 31, 38, and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Cox*.

Each of these claims ultimately depend from one of base claims 1, 11, or 32. As Applicant believes the above remarks demonstrate that the base claims 1, 11, and 32 are allowable, Applicant believes that the respective dependent claims are also allowable, and allowance of these claims is respectfully requested.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the Final Office Action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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